



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AE
F. #2020R00105

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 23, 2020

By FedEx and ECF
Robert Radick, Esq.
Morvillo Abramowitz
Grand Iason & Anello P.C.
565 Fifth Avenue
New York, NY 10017

Re: United States v. Gorgi Naumovski,
Criminal Docket No. 20-384 (WFK)

Dear Counsel:

Enclosed please find the government's production of discovery on the enclosed drives (the "Production") (DOJ0000526234 to DOJ0003719200 and DOJ0003719201 to DOJ0003798262). The Production has been encrypted, and the password will be sent to you separately by email. The contents of the Production have been designated "confidential" under the terms of the Protective Order in this case that was agreed to and acknowledged by you. The government also requests reciprocal discovery from the defendant.

Enclosed are additional materials associated with a call center owned and operated by a co-conspirator, which includes materials from computers, electronic devices and email accounts.

* * *

The government hereby renews its request for reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure. The government requests that the defendant allow inspection and copying of (1) any books, papers, documents, data, photographs, tapes, tangible objects, or copies or portions thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely on at trial, and (2) any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely upon at trial, or that were prepared by a witness whom the defendant intends to call at trial.

The government also requests that the defendant disclose prior statements of witnesses who will be called by the defendant to testify. See Fed. R. Crim. P. 26.2. In order to avoid unnecessary delays, the government requests that the defendant have copies of those statements available for production to the government no later than the commencement of trial.

The government also requests that the defendant disclose a written summary of testimony that the defendant intends to use as evidence at trial under Rules 702, 703, and 705 of the Federal Rules of Evidence. The summary should describe the opinions of the witnesses, the bases and reasons for the opinions, and the qualification of the witnesses.

Pursuant to Fed. R. Crim. P. 12.3, the government hereby demands written notice of the defendant's intention, if any, to claim a defense of actual or believed exercise of public authority, and also demands the names and addresses of the witnesses upon whom the defendant intends to rely in establishing the defense identified in any such notice.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney
Eastern District of New York

DANIEL KAHN
Acting Chief
Criminal Division, Fraud Section
U.S. Department of Justice

By: /s/ Andrew Estes
Andrew Estes
Trial Attorney
Criminal Division, Fraud Section
U.S. Department of Justice
(718) 254-6250

Enclosures (by FedEx only)

cc: Clerk of the Court (WFK) (by ECF) (without enclosures)